

**FILED UNDER SEAL PURSUANT TO
PROTECTIVE ORDER**

Exhibit E

to the Declaration of Dat Nguyen in Support of
KAIFI's Motion for Leave to Amend
Infringement Contentions

GIBSON DUNN

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November 30, 2020

VIA ELECTRONIC MAIL

Enoch H. Liang
LTL Attorneys LLP
300 S. Grand Ave., 14th Floor
Los Angeles, California 90071
enoch.liang@ltlatorneys.com

Re: KAIFI LLC v. T-Mobile US, Inc. et al., Case No. 2:20-cv-281 (E.D. Tex.)

Dear Mr. Liang:

I write on behalf of the T-Mobile to follow-up on the letter we sent November 13, 2020, regarding KAIFI's Disclosure of Asserted Claims & Infringement Contentions, for which we have not yet received a response.

We understand that in the interim your team has been facing some challenging circumstances, and in light of that, we understand that KAIFI might not be prepared to either respond to the issues raised in our letter substantively or amend its contentions at this time. This situation also presents a challenge for T-Mobile, in that T-Mobile's deadline for invalidity contentions is fast approaching, and any amendments to KAIFI's infringement contentions may affect our preparation of invalidity contentions. Thus, we would like to work with you on an appropriate timeline for responding to our letter and amending KAIFI's contentions.

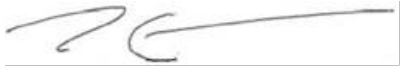
As an initial way forward, we ask that you let us know whether or not KAIFI plans to serve amended infringement contentions to remedy the issues we identified in our November 13, 2020 letter. If so, we would work with you on a schedule that takes into account your current situation, and allows the amended contentions be served to us with adequate time before our invalidity contentions would be due under the proposed schedule. Alternatively, if KAIFI does not intend to amend the contentions, it is important we know that now so we may timely seek the appropriate relief with the Court.

We would appreciate it if you could let us know by December 3, 2020, whether or not you plan to amend your infringement contentions so we may take the appropriate next steps. If you are not planning to amend your contentions, please let us know a time you are available to meet and confer on December 4, 2020. We appreciate your attention to this issue.

GIBSON DUNN

Enoch H. Liang
November 30, 2020
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Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Curtis", written over a horizontal line.

Nathan Curtis